

November 8, 2024

VIA CERTIFIED MAIL

The United States Attorney General and
All State Attorneys General
Identified on the Attached Service List

Re: Notice Pursuant to the Class Action Fairness Act of 2005: *Rhonda Henderson et al, (“Plaintiffs”) on behalf of themselves and all others similarly situated v. Vision Property Management, LLC et al (“Defendants”), No. 4:2020-cv-12649, United States District Court, Eastern District of Michigan, Southern Division.*

Dear Sir or Madam:

In accordance with the Class Action Fairness Act of 2005, 28 U.S.C. § 1715(b) (“CAFA”), this letter provides notice of a proposed settlement in the above-captioned putative class action, designated No. 4:2020-cv-12649, pending in the United States District Court, Eastern District of Michigan, Southern Division. This notice is served on behalf of Plaintiffs and all Settling Defendants, identified below.

Title 28, Section 1715 of the U.S. Code requires notice of a proposed class action settlement to be served upon appropriate federal and state officials. The required information under CAFA is set forth below. Also enclosed is a CD containing documents relating to the proposed settlement, as required by Section 1715. If you have any difficulty accessing any of the documents on the enclosed CD, please contact the undersigned.

***Item 1:** A copy of the complaint, any materials filed with the complaint, and any amended complaints. 28 U.S.C. § 1715(b)(1).*

On September 29, 2020, Plaintiffs Rhonda Henderson et al, on behalf of themselves and all others similarly situated, filed a Complaint in the United States District Court, Eastern District of Michigan, Southern Division. The Complaint asserted claims for alleged discriminatory targeting of Black homebuyers for abusive credit terms in home purchase transactions. On January 29, 2021, Plaintiffs Rhonda Henderson et al, on behalf of themselves and all others similarly situated, filed a First Amended Complaint in the United States District Court, Eastern District of Michigan, Southern Division. On April 24, 2024, Plaintiffs Rhonda Henderson et al, on behalf of themselves and all others similarly situated, filed a Second Amended Complaint in the United States District Court, Eastern District of Michigan, Southern Division. A copy of the original Complaint, First Amended Complaint, and Second Amended Complaint is included on the enclosed CD as **Exhibits 1-A, 1-B, and 1-C**.

***Item 2:** Notice of any scheduled judicial hearing in the class action 28 U.S.C. § 1715(b)(2).*

A NOTICE OF MOTION HEARING for a Hearing on November 19, 2024 at 01:00 PM was filed on November 1, 2024, and is included on the enclosed CD as **Exhibit 2**. Scheduled for the Motion Hearing is the PLAINTIFFS’ UNOPPOSED MOTION TO CERTIFY CLASS FOR SETTLEMENT PURPOSES AND DIRECT NOTICE OF SETTLEMENT TO THE CLASSES, included on the enclosed CD as **Exhibit 3**.

Items 3 and 4: Any proposed or final notification to the class members, 28 U.S.C. § 1715(b)(3); any proposed or final class action settlement. 28 U.S.C. § 1715(b)(4).

On October 30, 2024, the PLAINTIFFS' UNOPPOSED MOTION TO CERTIFY THE CLASSES FOR SETTLEMENT PURPOSES AND DIRECT NOTICE OF SETTLEMENT TO THE CLASSES, along with exhibits, was filed with the Court and is included on the enclosed CD as **Exhibit 3**. Exhibits to this document included the Settlement Agreement which is included on the enclosed CD as **Exhibit 4** and the Proposed Class Notices which is included on the enclosed CD as **Exhibit 5**.

Item 5: Any settlement or other agreement contemporaneously made between class counsel and counsel for the Defendant. 28 U.S.C. § 1715(b)(5).

The Settlement Agreement is included on the enclosed CD as **Exhibit 4**. There are no other agreements between class counsel and counsel for Defendants related to this matter other than those identified in the Settlement Agreement.

Item 6: Any final judgment or notice of dismissal. 28 U.S.C. § 1715(b)(6).

No final judgment or notice of dismissal on a class-wide basis has been entered.

Item 7: Either (i) the names of class members who reside in each State and estimated proportionate share of such members to the entire settlement; or (ii) if not feasible, a reasonable estimate of the number of class members residing in each State and estimated proportionate share of such members to the entire settlement. 28 U.S.C. § 1715(a)(7)(A)-(B).

The estimated number of class members residing in each State and the estimated proportionate share of members to the entire settlement is included on the attached CD as **Exhibit 6**.

Item 8: Any written judicial opinions relating to subparagraphs (3) through (6) under § 1715. 28 U.S.C. § 1715(b)(8).

No written judicial opinions have been entered by the Court in this matter relating to the materials described under subparagraphs (3) through (6).

The table below provides an index of the materials included on the enclosed CD.

	Description
1.	Exh 01-A-Original Complaint-Dkt 1
2.	Exh 01-B-First Amended Complaint-Dkt 77
3.	Exh 01-C-Second Amended Complaint-Dkt 205
4.	Exh 02-Notice of Motion Hearing-Dkt 265
5.	Exh 03-Motion to Certify class-Dkt-264
6.	Exh 04-Settlement Agreement-Dkt-264-2
7.	Exh 05-Proposed Class Notices-Dkt-264-3
8.	Exh 06-Count of Class Members by State

Sincerely,
R. Mark Unkefer
Case Manager
American Legal Claims Services, LLC

This Notice is provided on behalf of the Plaintiffs and the Settling Defendants, who are as follows: ACM Vision V, LLC ("ACM V"), Inmost Partners, DSAAgent LLC, Statebridge Company, LLC ("Statebridge"), DS Agent, LLC, JY First Co. Ltd., DSV SPV1 LLC, DSV SPV2 LLC, DSV SVP3 LLC, FTE Networks, Inc., US Home Rentals, LLC ("USHR"), Kaja Holdings, LLC, Kaja Holdings II, LLC, MI Seven, LLC, IN Seven, LLC, RVFM 4 Series, Boom SC, Alan Investments III, LLC, and HOMI Holdings, LLC.

Enclosures:
Attached Service List
CD

Henderson v Vision Property Mgmt CAFA NOTICE SERVICE LIST

Name	Department	Address	City	State	Zip
ATTORNEY GENERAL OF ALABAMA	CLASS ACTION FAIRNESS ACT NOTICES	501 WASHINGTON AVENUE	MONTGOMERY	AL	36104
ATTORNEY GENERAL OF ALASKA	CLASS ACTION FAIRNESS ACT NOTICES	1031 W 4TH AVENUE STE 200	ANCHORAGE	AK	99501-1994
ATTORNEY GENERAL OF AMERICAN SAMOA	CLASS ACTION FAIRNESS ACT NOTICES	AMERICAN SAMOA GOVT EXEC OFC BLDG	Pago Pago	AS	96799
ATTORNEY GENERAL OF ARIZONA	CLASS ACTION FAIRNESS ACT NOTICES	2005 N CENTRAL AVE	PHOENIX	AZ	85004-1592
ATTORNEY GENERAL OF ARKANSAS	CLASS ACTION FAIRNESS ACT NOTICES	323 CENTER ST STE 200	LITTLE ROCK	AR	72201-2610
ATTORNEY GENERAL OF CALIFORNIA	CLASS ACTION FAIRNESS ACT NOTICES	455 GOLDEN GATE AVENUE #11000	SAN FRANCISCO	CA	94102
ATTORNEY GENERAL OF COLORADO	CLASS ACTION FAIRNESS ACT NOTICES	RALPH L. CARR COLORADO JUDICIAL CENTER, 1300 N DENVER		CO	80203-2104
ATTORNEY GENERAL OF CONNECTICUT	CLASS ACTION FAIRNESS ACT NOTICES	165 CAPITOL AVE	HARTFORD	CT	06106-1659
ATTORNEY GENERAL OF DC	CLASS ACTION FAIRNESS ACT NOTICES	400 6TH ST NW 10TH FL	WASHINGTON	DC	20001
ATTORNEY GENERAL OF DELAWARE	CLASS ACTION FAIRNESS ACT NOTICES	CARVEL ST OFFICE BLDG 820 N FRENCH ST	WILMINGTON	DE	19801
ATTORNEY GENERAL OF FLORIDA	CLASS ACTION FAIRNESS ACT NOTICES	THE CAPITAL PL 01	TALLAHASSEE	FL	32399-1050
ATTORNEY GENERAL OF GEORGIA	CLASS ACTION FAIRNESS ACT NOTICES	40 CAPITOL SQUARE SW	ATLANTA	GA	30334-1300
ATTORNEY GENERAL OF GUAM	CLASS ACTION FAIRNESS ACT NOTICES	590 S. MARINE CORPS DR STE. 706	TAMUNING	GU	96913-3537
ATTORNEY GENERAL OF HAWAII	CLASS ACTION FAIRNESS ACT NOTICES	425 QUEEN ST	HONOLULU	HI	96813-2903
ATTORNEY GENERAL OF IDAHO	CLASS ACTION FAIRNESS ACT NOTICES	PO BOX 83720	BOISE	ID	83720-0010
ATTORNEY GENERAL OF ILLINOIS	CLASS ACTION FAIRNESS ACT NOTICES	JAMES R THOMPSON CTR 100 W RANDOLPH ST	CHICAGO	IL	60601
ATTORNEY GENERAL OF INDIANA	CLASS ACTION FAIRNESS ACT NOTICES	INDIANA GOVERNMENT CENTER SOUTH, 302 W WASINDIANAPOLIS	INDIANAPOLIS	IN	46204
ATTORNEY GENERAL OF IOWA	CLASS ACTION FAIRNESS ACT NOTICES	1305 E WALNUT ST HOOVER ST OFFICE BLDG	DES MOINES	IA	50319
ATTORNEY GENERAL OF KANSAS	CLASS ACTION FAIRNESS ACT NOTICES	120 SW 10TH AVE FL 2ND	TOPEKA	KS	66612-1597
ATTORNEY GENERAL OF KENTUCKY	CLASS ACTION FAIRNESS ACT NOTICES	700 Capital AVE	FRANKFORT	KY	40601-3410
ATTORNEY GENERAL OF LOUISIANA	CLASS ACTION FAIRNESS ACT NOTICES	PO BOX 94095	BATON ROUGE	LA	70804-9095
ATTORNEY GENERAL OF MAINE	CLASS ACTION FAIRNESS ACT NOTICES	STATE HOUSE STATION 6	AUGUSTA	ME	04333-0001
ATTORNEY GENERAL OF MASSACHUSETTS	CLASS ACTION FAIRNESS ACT NOTICES	1 ASHBURTON PL FL 20	BOSTON	MA	02108-1518
ATTORNEY GENERAL OF MARYLAND	CLASS ACTION FAIRNESS ACT NOTICES	200 Saint PAUL St Ste 1700	BALTIMORE	MD	21202-2029
ATTORNEY GENERAL OF MICHIGAN	CLASS ACTION FAIRNESS ACT NOTICES	PO BOX 30212	LANSING	MI	48909-7712
ATTORNEY GENERAL OF MINNESOTA	CLASS ACTION FAIRNESS ACT NOTICES	445 Minnesota Street Suite 1400	ST PAUL	MN	55101-2131
ATTORNEY GENERAL OF MISSISSIPPI	CLASS ACTION FAIRNESS ACT NOTICES	PO BOX 220	JACKSON	MS	39205-0220
ATTORNEY GENERAL OF MISSOURI	CLASS ACTION FAIRNESS ACT NOTICES	SUPREME COURT BLDG 207 W HIGH ST PO BOX 899	JEFFERSON CITY	MO	65101
ATTORNEY GENERAL OF MONTANA	CLASS ACTION FAIRNESS ACT NOTICES	215 N SANDERS ST	HELENA	MT	59601-4522
ATTORNEY GENERAL OF N. M. I.	CLASS ACTION FAIRNESS ACT NOTICES	PO BOX 10007	SAIPAN	MP	96950-8907
ATTORNEY GENERAL OF NEBRASKA	CLASS ACTION FAIRNESS ACT NOTICES	PO BOX 98920	LINCOLN	NE	68509
ATTORNEY GENERAL OF NEVADA	CLASS ACTION FAIRNESS ACT NOTICES	NVAGCAFAnotices@ag.nv.gov			
ATTORNEY GENERAL OF NEW HAMPSHIRE	CLASS ACTION FAIRNESS ACT NOTICES	33 CAPITOL STREET	CONCORD	NH	03301-6310
ATTORNEY GENERAL OF NEW JERSEY	CLASS ACTION FAIRNESS ACT NOTICES	25 MARKET ST	TRENTON	NJ	08611-2148
ATTORNEY GENERAL OF NEW MEXICO	CLASS ACTION FAIRNESS ACT NOTICES	PO BOX 1508	SANTA FE	NM	87504-1508
ATTORNEY GENERAL OF NEW YORK	CLASS ACTION FAIRNESS ACT NOTICES	LITIGATION BUREAU JUSTICE BLDG 2ND FL	ALBANY	NY	12224
ATTORNEY GENERAL OF NORTH CAROLINA	CLASS ACTION FAIRNESS ACT NOTICES	PO BOX 629	RALEIGH	NC	27602-0629
ATTORNEY GENERAL OF NORTH DAKOTA	CLASS ACTION FAIRNESS ACT NOTICES	STATE CAPITOL 600 E BLVD AVE	BISMARCK	ND	58505
ATTORNEY GENERAL OF OHIO	CLASS ACTION FAIRNESS ACT NOTICES	30 E BROAD ST FL 14TH	COLUMBUS	OH	43215-3414
ATTORNEY GENERAL OF OKLAHOMA	CLASS ACTION FAIRNESS ACT NOTICES	313 NE 21ST STREET	OKLAHOMA CITY	OK	73105-3207
ATTORNEY GENERAL OF OREGON	CLASS ACTION FAIRNESS ACT NOTICES	JUSTICE BLDG 1162 COURT ST NE	SALEM	OR	97301
ATTORNEY GENERAL OF PENNSYLVANIA	CLASS ACTION FAIRNESS ACT NOTICES	STRAWBERRY SQUARE 16TH FL	HARRISBURG	PA	17120-0001
ATTORNEY GENERAL OF PUERTO RICO	CLASS ACTION FAIRNESS ACT NOTICES	PO BOX 9020192	SAN JUAN	PR	00902-0192
ATTORNEY GENERAL OF RHODE ISLAND	CLASS ACTION FAIRNESS ACT NOTICES	4 HOWARD AVE	CRANSTON	RI	02920-3031
ATTORNEY GENERAL OF SOUTH CAROLINA	CLASS ACTION FAIRNESS ACT NOTICES	1000 ASSEMBLY ST STE 510	COLUMBIA	SC	29201-3117
ATTORNEY GENERAL OF SOUTH DAKOTA	CLASS ACTION FAIRNESS ACT NOTICES	1302 EAST HWY 14 STE 1	PIERRE	SD	57501-8501
ATTORNEY GENERAL OF TENNESSEE	CLASS ACTION FAIRNESS ACT NOTICES	500 DR MARTIN LUTHER KING BLVD	NASHVILLE	TN	37243-0001
ATTORNEY GENERAL OF TEXAS	CLASS ACTION FAIRNESS ACT NOTICES	PO BOX 12548	AUSTIN	TX	78711-2548
ATTORNEY GENERAL OF UNITED STATES	CLASS ACTION FAIRNESS ACT NOTICES	950 PENNSYLVANIA AVE NW	WASHINGTON	DC	20530-0001
ATTORNEY GENERAL OF US VIRGIN ISLAN	CLASS ACTION FAIRNESS ACT NOTICES	3438 KRONPRINDSENS GADE Ste 2ND	ST THOMAS	VI	00802-5751
ATTORNEY GENERAL OF UTAH	CLASS ACTION FAIRNESS ACT NOTICES	350 N State St STE 230	SALT LAKE CITY	UT	84114-0002
ATTORNEY GENERAL OF VERMONT	CLASS ACTION FAIRNESS ACT NOTICES	109 State St	MONTPELIER	VT	05609-1001
ATTORNEY GENERAL OF VIRGINIA	CLASS ACTION FAIRNESS ACT NOTICES	202 NORTH NINTH STREET	RICHMOND	VA	23219-3424
ATTORNEY GENERAL OF WASHINGTON	CLASS ACTION FAIRNESS ACT NOTICES	800 5TH AVE STE 2000	SEATTLE	WA	98104-3188
ATTORNEY GENERAL OF WEST VIRGINIA	CLASS ACTION FAIRNESS ACT NOTICES	STATE CAPITOL COMPLEX, BLDG. 1, RM E-26, 1900 K	CHARLESTON	WV	25305
ATTORNEY GENERAL OF WISCONSIN	CLASS ACTION FAIRNESS ACT NOTICES	PO BOX 7857	MADISON	WI	53707-7857
ATTORNEY GENERAL OF WYOMING	CLASS ACTION FAIRNESS ACT NOTICES	STATE CAPITOL BLDG	CHEYENNE	WY	82002-0001